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14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 AMERICAN NATIONAL PROPERTY AND  
17 CASUALTY COMPANY,

18 Plaintiff,

19 vs.

20 SHAUN MICHAEL CALEY, an individual;  
21 P.E.P. as Parent and Guardian ad Litem of  
22 JANE DOE, a minor; DOES I through X;  
23 ROES I through X;

24 Defendants.

25 Case No.: 2:24-cv-01723-JAD-BNW

26 **STIPULATION AND ORDER  
EXTENDING TIME TO SUBMIT  
DISCOVERY PLAN AND  
SCHEDULING ORDER  
(Second Request)**

27 Plaintiff AMERICAN NATIONAL PROPERTY AND CASUALTY COMPANY  
28 (“ANPAC”), Defendant SHAUN MICHAEL CALEY, (“Caley”), and P.E.P. as Parent and  
Guardian ad Litem of JANE DOE (“P.E.P.”) (collectively referred to as the “Parties”), by and  
through their respective undersigned counsel of record, hereby stipulate and agree to extend the  
date for submission of the Parties’ Discovery Plan and Scheduling Order (“DPSO”) for an  
additional sixty (60) days, to March 17, 2025.

29 On December 17, 2024, the parties agreed to extend the deadline date to submit a  
30 stipulated DPSO for thirty days, from December 17, 2024, to January 16, 2025, based on a

1 settlement reached between the parties (ECF. No. 19). This Court signed the Order granting the  
 2 extension (ECF No. 20). This Court also denied as moot, and without prejudice, the pending  
 3 Motion to Dismiss and Motion to Stay (ECF Nos. 12 and 13), and allowed the parties to refile  
 4 their Motions, if necessary, by January 26, 2025 (ECF No. 20).

5 The parties need additional time to complete the settlement and dismiss the underlying  
 6 State Case. Specifically, a minor's compromise case still must be submitted and approved.  
 7

8 The Parties have therefore agreed to extend the time for submission of the DPSO for  
 9 sixty (60) days, to March 17, 2025, or to file a Stipulation to Dismiss prior to that date. In  
 10 addition, the Parties agree to extend the date to refile the Motion to Dismiss and/or Motion to  
 11 Stay by sixty (60) days, to March 27, 2025.

12 This is the Parties' Second Request for Extension of the deadline to submit a stipulated  
 13 DPSO.

15 DATED this \_\_\_\_ day of January, 2025.

16 **PYATT SILVESTRI**

17 */s/ Richard Waltjen*

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28 //

15 DATED this \_\_\_\_ day of January, 2025.

16 **DRUMMOND LAW FIRM**

17 */s/ Craig W. Drummond*

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 27 Litem of JANE DOE*

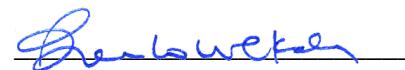
1 DATED this \_\_\_\_ day of January, 2025.

2 **WHITMIRE LAW, PLLC**

3 */s/ James E. Whitmire*

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*Attorney for P.E.P. as parent and Guardian Ad  
Litem of JANE DOE*

9 **IT IS SO ORDERED:**

10   
11 UNITED STATES DISTRICT  
12 JUDGE/UNITED STATES MAGISTRATE  
13 JUDGE

14 DATED: 1/13/2025